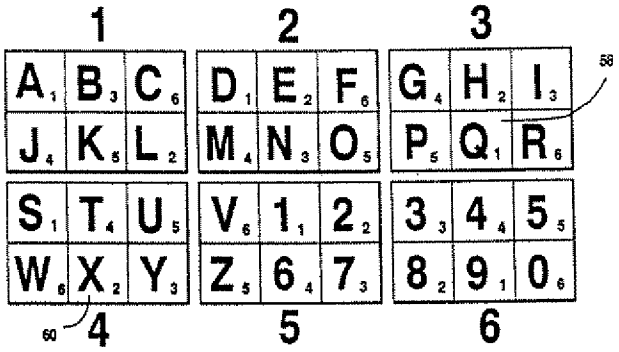
REMARKS

Independent Claim 42

Claim 42 recites a keyboard with 26 keys that are each labeled with both a different letter of the alphabet and a number. This is not suggested by the Nokia User's Manual in view of Lapeyre's Fig. 3 (shown below) as the Examiner contends. Although Nokia's keyboard (Fig. 2-11) does have 26 letter keys, none of them -- much less all 26 of them -- is labeled with an assigned number as claimed. Lapeyre's keyboard of Fig. 3 (shown below) has only six keys that are used to enter any one of 36 characters (A-Z and 0-9). This requires two key-strokes for each character entered. The first key-stroke specifies six characters, and the second key-stroke selects one of those six. For this purpose, each key is labeled with six letters, six corresponding small numbers, and one large number. The sole purpose of all these numbers is to inform the user which key to press for the second key-stroke.

FIG. 3



Accordingly, applying Lapeyre's numbers to Nokia's keyboard, as the Examiner suggests, would render the numbers unusable for their intended purpose. Their sole purpose in Lapeyre is to guide the user in making a second key-stroke. Since Nokia's keyboard does not need a second key-stroke (because it has one key for each character), Lapeyre's numbers would serve no purpose. Secondly, Nokia's keyboard already has ten number keys. So the skilled person would consider it redundant and confusing to label Nokia's letter keys with numbers too.

In fact, the skilled person would never consider combining Lapeyre with Nokia in the first place. That is because Lapeyre's sole purpose is to enable entering 36 characters with far fewer than 36 keys. This purpose is irrelevant to Nokia, which has a separate key for each character. The irrelevance of Lapeyre to Nokia is accentuated by Lapeyre's labeling each key with multiple letters and multiple numbers and then requiring the user to press two keys for each character entered. Therefore, claim 42 is patentable over the cited prior art.

Independent Claim 47

In claim 47, each of the keyboard's 26 keys is labeled with a different letter of the alphabet and assigned a number. This is not suggested by Nokia in view of Lapeyre as the Examiner contends, for the following reasons:

The skilled person would never consider combining Lapeyre with Nokia. That is because Lapeyre's sole purpose is to enable entering 36 characters with far fewer than 36 keys. This purpose is irrelevant to the Nokia, which (like the keyboard of claim 47) already has one key for each letter. The irrelevance of Lapeyre to Nokia is accentuated by Lapeyre's labeling each key with multiple letters and multiple numbers and then requiring the user to press two keys for each character entered.

Also, Lapeyre's numbers would be unusable for their intended purpose if applied to Nokia's keyboard. Their sole purpose in Lapeyre is to guide the user in making a second key-stroke. This purpose is irrelevant to Nokia's keyboard, which does not need a second key-stroke (because it has a separate key for each character).

Claim 47 further recites generating a telephony tone signal corresponding to the number assigned to the pressed letter key. This limitation, too, is not suggested by the references. Lapeyre has no telephony signal, and Nokia's telephony signal is generated solely from its ten number keys. The prior art provides no suggestion to generate telephony signals from Nokia's letter keys too, nor any guidance as to how or why that would be done.

Therefore, on multiple grounds, claim 47 is patentable over the prior art.

Independent Claim 51

Claim 51 recites a device having a keyboard with letters arranged in a QWERTY configuration. For each letter pressed by a user, the device communicates a number in the range 0-9 that is assigned to the pressed letter.

This is not disclosed by Lapeyre's Fig. 3 (shown above) as the Examiner suggests. First, the letters of Lapeyre's Fig. 3 device are not arranged in a QWERTY configuration as claimed. Second, although each letter of Lapeyre's device is assigned a number, that number is not, as claimed, communicated by the device when the letter is pressed. Only the letter itself is communicated. Lapeyre's number serves only to indicate to the user which second key to press to communicate the desired letter. Therefore, claim 51 is patentable over the cited prior art.

Dependent Claims 43-46, 48-50 and 52-53

The remaining claims all depend from base claims that are explained above to be patentable over the prior art. The limitations that the dependent claims add to the base claims distinguish them further from the prior art. Therefore, the dependent claims are also patentable over the prior art.

The application is therefore now in condition for allowance, and allowance is requested.

Respectfully submitted,

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